



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

1069567 - R8 SDMS

Susan -
Thank

November 3, 1997

Ref: 8MO

Daniel March
Hydrometrics, Inc.
2727 Airport Rd.
Helena, MT 59601

Dear Dan:

I am writing in response to your October 31, 1997 letter requesting approval of ASARCO's sludge disposal options. The options ASARCO presents require review by the Air and RCRA staffs at Montana DEQ and EPA before final approval can be granted.

Specifically, the Group 1 landfill option should not present a problem, as long as the sludge meets the paint filter and TCLP tests. However, the Group 1 smelter option may be subject to air quality regulation.

Likewise, the Group 2 hazardous waste disposal option should be approvable, as long as the sludge meets all applicable local, state, and federal laws. But the Group 2 smelter option is subject to a determination by the State and EPA regarding recycling and acceptance criteria.

I am forwarding your October 31 letter to the appropriate reviewers at DEQ and EPA and will coordinate with those individuals in a response to Hydrometrics. If you have any questions or concerns, please phone me at 441-1130, x235.

Sincerely,

Gwen Jacobs
NPDES Program

cc: Betsy Wahl, 8MO, Air Quality
Susan Zazzali, 8MO, RCRA
Don Vidrine, DEQ, Air and Waste Management Bureau



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